

**DECLARATION OF MICHAEL KALINER, ESQUIRE
IN SUPPORT OF DEBTOR’S MOTION TO SET ASIDE UPSET TAX SALE WITH
REGARD TO PROPERTY LOCATED AT 14 GREEN LANE, BRISTOL, PA 19007**

I, Michael Kaliner, Esquire, of full age, being duly sworn according to law, hereby declare as follows:

1. I am an attorney and admitted to practice in the Commonwealth of Pennsylvania and before this Court.

2. For 27 years I served as Chapter 7 bankruptcy trustee under the supervision of the United States Trustee for the Eastern District of Pennsylvania.

3. I operate a law firm known as the Law Office of Adelstein & Kaliner, P.C. 3993 Huntingdon Pike, Suite 210, Huntingdon Valley, PA.

4. I am the lead attorney for Kevin J. Wright (“Debtor”) in the matter docketed as: *In re: Kevin J. Wright*, USBC ED of PA 15-17104-amc, Chapter 11.

5. I submit this Declaration (the “Declaration”) on my own behalf in support of the Motion (the “Motion”) of Kevin J. Wright (the “Debtor”), for entry of an order, granting a Motion to Set Aside Sheriff Sale. Except as otherwise indicated herein, I have a personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

BACKGROUND

6. On October 1, 2015 (the “Petition Date”), Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Pennsylvania (the “Court”).

7. Shortly before the Bucks County Upset Tax sale on 9/18/2018, the Debtor forwarded to me the Notice of Tax Sale for his Property located at 14 Green Lane, Bristol, PA 19007 (“Property”).

8. On the sale date I went to the Bucks County Courthouse, I met with John Torrente, Esq., then Solicitor for the Bucks County Tax Claim Bureau, and advised him of the pending Bankruptcy (he seemed to already have known about it). Mr. Torrente advised me that the Property would be removed from the sale list. Expecting that it would be permanently deferred, I left before the sales were announced. I did not receive any communication from the Solicitor that the sale was postponed to the November list. The current Solicitor for the Tax Claim Bureau provided me with documentation from the Tax Claim Bureau. The documents fail to reference Debtor's bankruptcy or the reason for the postponement of the sale of the Property.

9. When I learned of the sale in May 2019 I communicated with Mr. Torrente, who didn't recall my attending the sale and/or advising of the Bankruptcy.

Respectfully submitted,

THE LAW OFFICE OF ADELSTEIN & KALINER, P.C.

By: /s/ Michael Kaliner
MICHAEL KALINER, ESQUIRE

Dated: November 18, 2021